

JUDGE CAPRONI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : SEALED INDICTMENT
:
- v. - : 20 Cr. _____
:
ANTHONY LALLAVE, :
a/k/a "Tone," :
MICHAEL LILLO, :
a/k/a "Snow," and :
DEWESE HUGHES, :
a/k/a "Special," :
Defendants. :
----- X

20 CRIM 536

COUNT ONE

(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about September 2018, up to and including at least in or about October 2020, in the Southern District of New York and elsewhere, ANTHONY LALLAVE, a/k/a "Tone," MICHAEL LILLO, a/k/a "Snow," and DEWESE HUGHES, a/k/a "Special," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ANTHONY LALLAVE, a/k/a "Tone," MICHAEL LILLO, a/k/a "Snow," and DEWESE HUGHES, a/k/a "Special," the defendants, and others known

and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that ANTHONY LALLAVE, a/k/a "Tone," MICHAEL LILLO, a/k/a "Snow," and DEWESE HUGHES, a/k/a "Special," the defendants, conspired to distribute and possess with intent to distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Indictment, ANTHONY LALLAVE, a/k/a "Tone," MICHAEL LILLO, a/k/a "Snow," and DEWESE HUGHES, a/k/a "Special," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



FOREPERSON


Audrey Strauss
AUDREY STRAUSS
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(21 U.S.C. § 846.)

AUDREY STRAUSS
Acting United States Attorney


Foreperson
